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Food Safety And Inspection Service
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# AUDIT REPORT FOR ROMANIA
NOVEMBER 15 THROUGH DECEMBER 1, 2000

## INTRODUCTION

### Background

This report reflects information that was obtained during an audit of Romania's meat inspection system from November 15 through December 1, 2000. Three establishments certified to export meat to the United States were audited. Two of these were slaughter establishments; the other one was conducting processing operations.

The last audit of the Romanian meat inspection system was conducted in February/March 2000. Three establishments were audited and all three were acceptable. Five major concerns were reported at that time:

1. The HACCP plan did not state adequately the procedures that the establishment will use to verify that the plan is effectively implemented and the frequency with which these procedures will be performed. Neither establishment personnel nor GOR meat inspection officials were performing adequate ongoing verification activities of HACCP program in Establishments 2, 12, and 68. *This was found, during this new audit, to have been adequately corrected.*

2. The HACCP plan needed to be revised to ensure compliance with zero tolerance for visible fecal material on carcasses in Establishments 2 and 68. The requirement of "zero tolerance" for fecal material on carcasses was not enforced by either establishment officials or GOR meat inspection officials and monitoring records were not maintained to verify this activity. *This had been corrected, but in Est. 2/A2, the written procedures for ensuring zero tolerance for fecal contamination were not clearly defined.*

3. Monitoring frequencies and corrective actions followed in response to a deviation from a critical limit were not addressed adequately in the written HACCP plans of Establishments 2, 12, and 68. *This had been corrected*.

4. Both establishment and inspection personnel had been unaware of the requirement for a pre-shipment review of each shipment eligible for export to the U.S. *This was resolved.*

5. The following information was not recorded in the official record books for Laboratory Quality Assurance Program: lot numbers, expiration dates for standard solutions, reagents, and media ingredients. The record books were not signed and verified by the supervisor before the new solutions were prepared by the technicians or chemists. The

records for corrective actions taken when unacceptable check sample results were reported. *These deficiencies had been adequately addressed and corrected.*

Cattle and pork species and cured (dried) smoked product, cooked sausages and shelf stable canned product is eligible for export to the U.S.

During calendar year 2000, Romanian establishments did not export any meat product to the U.S.

## PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with Romanian national meat inspection officials to discuss oversight programs and practices, including enforcement activities. The second entailed an audit of records pertaining to residue control in the meat inspection headquarters facilities preceding the on-site visits. The third was conducted by on-site visits to establishments. The fourth was a visit to two laboratories, one performing both; analytical testing of field samples for the national residue testing program, and culturing field samples for the presence of microbiological contamination with *Salmonella* and the other performing only analytical testing of field samples for the national residue testing program

Romania's program effectiveness was assessed by evaluating five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOPs), (2) animal disease controls, (3) residue controls, (4) slaughter/ processing controls, including the implementation and operation of Hazard Analysis and Critical Control Point (HACCP) systems and the *E. coli* testing program, and (5) enforcement controls, including the testing program for *Salmonella* species.

During all on-site establishment visits, the auditor evaluated the nature, extent, and degree to which findings impacted on food safety and public health, as well as overall program delivery. The auditor also determined if establishment and inspection system controls were in place. Establishments that do not have effective controls in place to prevent, detect and eliminate product contamination/adulteration are considered unacceptable and therefore ineligible to export products to the U.S., and are delisted accordingly by the country's meat inspection officials.

## RESULTS AND DISCUSSION

### Summary

Except as otherwise noted, effective inspection system controls were found to be in place in the three establishments audited; two of these (Est.2/A2 and Est.68) were recommended for re-review. Details of audit findings, including compliance with HACCP, SSOPs, and testing programs for *Salmonella* and generic *E. coli,* are discussed later in this report.



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As stated above, five major concerns had been identified during the last audit of the Romanian meat inspection system, conducted in February/March 2000. During this new audit, the auditor determined that the concerns had been addressed and corrected.

During the last audit, HACCP-implementation deficiencies had been found in three establishments (Ests. 2/A2, A12, and 68). During this new audit, implementation of the required HACCP programs was again found to be deficient in Est. A/2A; it was now adequate in the other two. Overall, there was improvement in HACCP verification and only the column for verification was missing in the record keeping part of the HACCP programs. Also, the zero tolerance for fecal contamination in their HACCP program was unclear. Details are provided in the Slaughter/ Processing Controls section later in this report.

## Entrance Meeting

On November 17, an entrance meeting was held in the Bucharest offices of the Food Hygiene and Public Health Directorate (FHPHD), National Sanitary Veterinary Agency (NSVA), Ministry of Agriculture and Food (MAF) and was attended by Dr. Marilena Barcan, Director, FHPHD; Dr. Ion Nisipasu, State Inspector; Dr. Anca Ciuciuc, Veterinary Doctor; Dr. Sergiu Meica, Director, the Hygiene and Veterinary Public Institute reference laboratory, and Dr. Oto Urban, International Audit Staff Officer. Topics of discussion included the following:

1. Updates on the inspection system of Romania
2. The audit itinerary and travel arrangements
3. Animal diseases status in Romania according to APHIS
4. Enforcement
5. *Listeria monocytogenes* testing
6. The status of species verification in Romania

## Headquarters Audit

There had been no changes in the organizational structure or upper levels of inspection staffing since the last U.S. audit of Romania's inspection system in February/March 2000.

To gain an accurate overview of the effectiveness of inspection controls, FSIS requested that the audits of the individual establishments be led by the inspection officials who normally conduct the periodic reviews for compliance with U.S. specifications. The FSIS auditor (hereinafter called "the auditor") observed and evaluated the process.



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The auditor conducted a review of inspection system documents pertaining to the establishments listed for records review. This records review was conducted at the meat inspection headquarters. The records review focused primarily on food safety hazards and included the following:

- Internal review reports.
- Supervisory visits to establishments that were certified to export to the U.S.
- Training records for inspectors and laboratory personnel.
- Label approval records such as generic labels.
- New laws and implementation documents such as regulations, notices, directives and guidelines.
- Sampling and laboratory analyses for residues.
- Pathogen reduction and other food safety initiatives such as SSOPs, HACCP programs, generic *E. coli* testing and *Salmonella* testing.
- Sanitation, slaughter and processing inspection procedures and standards.
- Control of products from livestock with conditions such as tuberculosis, cysticercosis, etc., and of inedible and condemned materials.
- Export product inspection and control including export certificates.
- Enforcement records, including examples of criminal prosecution, consumer complaints, recalls, seizure and control of noncompliant product, and withholding, suspending, withdrawing inspection services from or delisting an establishment that is certified to export product to the United States.

No concerns arose as a result the examination of these documents.

## Government Oversight

All inspection veterinarians and inspectors in establishments certified by Romania as eligible to export meat products to the United States were full-time FHPHD employees, receiving no remuneration from either industry or establishment personnel.

## Establishment Audits

Three establishments were certified to export meat products to the United States at the time this audit was conducted; all were visited for on-site audits. In all these establishments, both FHPHD inspection system controls and establishment system controls were in place to prevent, detect and control contamination and adulteration of products. Except in one case involving Est. 2/A2, corrective actions were prompt and effective. Establishment A12 was acceptable, and establishments 2/A2 & 68) were evaluated as acceptable/re-review.



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Laboratory Audits

During the laboratory audits, emphasis was placed on the application of procedures and standards that were equivalent to U.S. requirements. Information was also collected about the risk areas of government oversight of certified, or approved laboratories, intra-laboratory quality assurance procedures, including sample handling and methodology.

The Hygiene and Veterinary Public Institute reference laboratory in Bucharest was visited on November 20, 2000, and the Regional Residue Laboratory in Timisoara on November 27, 2000. The reference laboratory in Bucharest was accredited in 1998 by the national accreditation body called RENAR for chemical control, microbiological control and toxicological control.

Except as noted below, effective controls were in place for sample handling and frequency, timely analysis, data reporting, tissue matrices for analysis, equipment operation and printouts, minimum detection levels, recovery frequency, percent recoveries, check sample frequency and corrective actions. The methods used for the analyses were acceptable. No compositing of samples was done (this was not a deficiency).

Neither laboratory was testing field samples for arsenic.

Romania's microbiological testing for *Salmonella* species was being performed in government laboratories. One of these, the Hygiene and Veterinary Public Institute laboratory in Bucharest, was audited. No deficiencies were found.

Establishment Operations by Establishment Number

As previously stated, Romania had not exported any meat to the United States during CY 2000. Thus, any production observed was for domestic use. The following operations were being conducted in the three establishments:
Establishment 2/A2: swine slaughter, boning, cooked sausages, and canned products
Establishment A12: cured and smoked pork products; currently not active producer
Establishment 68: cattle and swine slaughter, boning, cured/dried/smoked products, and canned products; currently not active producer

SANITATION CONTROLS

Based on the on-site audits of establishments, Romania's inspection system had controls in place for water potability records, chlorination procedure, back siphonage prevention, hand washing facilities, separation of establishments, pest control, temperature control, lighting, operations and inspector work space, ventilation, facilities approval, equipment approval, over-product and product contact equipment, dry storage areas, antemortem and welfare facilities, outside premises, personal dress and habits, personal hygiene practices, sanitary



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dressing procedures, cross contamination prevention, product handling and storage, product reconditioning, product transportation, operational sanitation and waste disposal.

Sanitation Standard Operating Procedures (SSOPs)

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment A).

The SSOPs were found to meet the basic FSIS regulatory requirements.

The following sanitation deficiencies were observed:

Pre-operational Sanitation

Dirty equipment was found in the bovine slaughter room in Establishment 2/A2. *This was scheduled for correction.*

Sanitizers

In Establishment 2/A2, the thermometer for the sanitizers in the slaughter room was found to be non-functional. *Corrective action was immediate*.

Effective Maintenance Program

In Establishment 68, the maintenance program was ineffective in that it did not ensure prevention and correction of defects such as rust on chains and on the carcass splitter, dirty hooks (in the swine slaughter area), broken bricks, flaking paint in coolers), residue containing brine in injection needles, dirty aprons in the boning room, and a large gap between an outside door and floor in the export area. This was scheduled for corrective action. In Establishment A12, a few pieces of rusty product-contact equipment were observed in the drying room. They were immediately removed for reconditioning.

ANIMAL DISEASE CONTROLS

Romania's inspection system had controls in place to ensure adequate animal identification, ante-mortem and post-mortem inspection procedures and dispositions, condemned and restricted product control, and procedures for sanitary handling of returned and rework product.

There were reported to have been no outbreaks of animal diseases with public-health significance since the previous U.S. audit, with the exception of sporadic occurrence of trichinellosis in the small farm areas. No cases of Bovine Spongiform Encephalopathy (BSE) have been reported in Romania, as of the writing of this report. However, according to APHIS, because of import requirements less restrictive than those that would be



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acceptable for import into the U.S. and/or because of inadequate surveillance, there is an undue risk of introducing BSE into the U.S.

## RESIDUE CONTROLS

Romania's National Residue Testing Plan for 2000 was being followed, and was on schedule. The Romanian inspection system had adequate controls in place to ensure compliance with sampling and reporting procedures and storage and use of chemicals.

GOR inspection service received and completed Residue Questionnaire sent by International Policy Division and discussed the document with the auditor during his laboratory audit.

A visit was made to the farm where pigs were raised and supplied to the establishment in Bacau. The farmers grew their own feed (cereal, corn, soy, fishmeal, and oats). An automatic feed distribution system was used by the company.

The floors and walls were constructed of concrete, and the insulated roof of plastic. The source of the water used was on-site wells. Swine were separated according to age and pens were divided into wet and dry sections. The buildings had heating systems for the winter. There was an accessory electrical heating system for farrowed piglets. Each sow had an identification card and an ear tag.

An official veterinarian was on duty at the farm, and he supervised the company veterinarians. Decisions made by the official veterinarian on any professional issues were final. The official veterinarian was performing the residue sampling and samples were sent to Bucharest and Germany for analysis. Veterinary drugs were kept in the official office; they were registered and under veterinary supervision. Pharmaceuticals were prescribed and administered by veterinarians only.

## SLAUGHTER/PROCESSING CONTROLS

Except as noted below, the Romanian inspection system had controls in place to ensure adequate pre-boning trim, boneless meat reinspection, ingredients identification, control of restricted ingredients, formulations, packaging materials, laboratory confirmation, label approvals, inspector monitoring, processing schedules and equipment, processing records, empty can inspection, filling procedures, container closure examination, interim container handling, post-processing handling, processing defect actions-plan, and processing control by inspection personnel.

Improper stunning of swine was observed in Est. 2/A2. The operator was not administering electric current properly, with the result that corneal reflexes were present several animals after stunning. Corrective actions were taken immediately by inspection personnel.



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HACCP Implementation

All establishments approved to export meat products to the U.S. are required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment B).

The HACCP programs were found to meet the basic FSIS regulatory requirements with the following major concerns:

1. In Est. 2/A2, the written "zero tolerance" program for fecal contamination was not clearly defined.

2. In Est. 2/A2, HACCP verification was being performed but was missing in the written program.

3. In Est. 2/A2, the documentation for the monitoring of the Critical Control Point in the slaughter operation was missing.

These three deficiencies were scheduled for correction.

Testing for Generic *E. coli*

Romania had adopted the FSIS regulatory requirements for generic *E. coli* testing.

Two of the three establishments audited were required to meet the basic FSIS regulatory requirements for generic *E. coli* testing, and were audited and evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment C).

The *E. coli* testing programs were found to meet the basic FSIS regulatory requirements with the following exception:

1. In Ests. 2/A2 and 68, the selection of carcasses for *E. coli* testing was not performed randomly but by pre-selection by the supervisor.
2. In Est. 68, there was no written designation of employees responsible to collect *E. coli* samples.

These deficiencies were corrected immediately.

Additionally, establishments had adequate controls in place to prevent meat products intended for Romania domestic consumption from being commingled with products eligible for export to the U.S.



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Control of *Listeria monocytogenes*

The GOR inspection service had a surveillance program for testing ready-to-eat products for *Listeria monocytogenes*. This testing was mandatory for exported product. In the future, *Listeria* testing will be included in the establishments' HACCP plan.

ENFORCEMENT CONTROLS

Inspection System Controls

The Romanian inspection system controls [ante-and post-mortem inspection procedures and dispositions, control of restricted product and inspection samples, control and disposition of dead, dying, diseased or disabled animals, boneless meat reinspection, shipment security, including shipment between establishments, prevention of commingling of product intended for export to the United States with domestic product, monitoring and verification of establishment programs and controls (including the taking and documentation of corrective actions under HACCP plans), inspection supervision and documentation, the importation of only eligible livestock or poultry from other countries (i.e., only from eligible countries and certified establishments within those countries), and the importation of only eligible meat or poultry products from other counties for further processing] were in place and effective in ensuring that products produced by the establishment were wholesome, unadulterated, and properly labeled. In addition, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

Testing for *Salmonella* Species

Two of the three establishments were required to meet the basic FSIS regulatory requirements for *Salmonella* testing, and were evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment D).

Romania has adopted the FSIS regulatory requirements for *Salmonella* testing. The *Salmonella* testing programs were found to meet the basic FSIS regulatory requirements with the following exception:

1. In both establishments, there was no HACCP reassessment step, in case of *Salmonella* violation.
2. The samples were not being taken randomly.

The Romanian officials gave assurances that these deficiencies would be corrected promptly.



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Species Verification Testing

At the time of this audit, Romania was not exempt from the species verification requirement. The auditor verified that species verification testing was being conducted in accordance with FSIS requirements. The Romanian officials had applied for exemption from the species verification requirement with International Policy Division (IPD).

Monthly Reviews

FSIS requires documented supervisory visits by a representative of the foreign inspection system to each establishment certified as eligible to export to the United States, not less frequently than one such visit per month, during any period when the establishment is engaged in producing products that could be used for exportation to the United States.

These reviews were being performed by the Romanian equivalent of Circuit Supervisors. All were veterinarians with several years of experience.

The internal review program was applied equally to both export and non-export establishments. Some internal review visits were announced in advance and some were not. They were conducted, at times by individuals and at other times by a team, at least once monthly. The records of audited establishments were kept in the inspection offices of the individual establishments, and copies were also kept in district offices and in the central offices of the National Sanitary Veterinary Agency in Bucharest, and were routinely maintained on file for a minimum of 3 years.

In the event that an establishment is found, during one of these internal reviews, to be out of compliance with U.S. requirements, and is delisted for U.S. export, before it may again qualify for eligibility to be reinstated, a commission is empowered to conduct an in-depth review, and the results are reported to Drs. Mircea Chertes, General Director, and Marilena Barcan, Director FHPHD, NSVA, for evaluation; they formulate a plan for corrective actions and preventive measures.

GOR has provided training to field inspector on HACCP/PR, and SSOP programs.

Enforcement Activities

Controls were in place to ensure adequate export product identification, inspector verification, export certificates, a single standard of control throughout the establishments, inspection supervision, controls of security items, shipment security, species verification, and product entering the establishments from outside sources.

The GOR inspection service had a regulation to enforce action in the event that an establishment does not meet the *Salmonella* performance standards. The GOR inspection



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service, through Veterinary Police, has been detecting and detaining potentially hazardous food in commerce to prevent its consumption.

The procedure for imposing sanctions and fines was established by government decision (Mr. 794/1993), which was recently modified by government decision (605/2000). These sanctions and fines are applied in the case of misdemeanor, and are imposed on the local, regional and central level. Only in the felony case, names of violators can be published. The felony cases are proceeded by court.

Exit Meetings

An exit meeting was conducted in Bucharest on November 30, 2000. The participants included Dr. Virgil Marcel Eftime, Deputy General Director, NSVA; Dr. Marilena Barcan, Director, FHPHD; Dr. Dana Tanase, Chief, Food Hygiene Service; Dr. Ion Nisipasu, Chief, Food Hygiene Service, FHPHD; Dr. Anca Ciuciuc, Inspector, FHPHD; Dr. Sergiu Meica, Director, the Hygiene and Veterinary Public Health Institute and Dr. Oto Urban, International Audit Staff Officer. The following topics were discussed:

*1.* Condensation control and lack of immediate corrective action in Est. 2/A2. *The Romanian officials gave assurances that immediate corrective action will be required in the future.*

*2.* Maintenance program deficiencies in Est. 68. *The GOR inspection officials gave assurances that an improved maintenance program would be implemented and monitored.*

3. Improper stunning of swine in Est. 2/A2. *Corrective action had been immediate.*

*4.* There had been no random carcass selection for *E. coli* and *Salmonella* testing in either slaughtering establishment. Also, HACCP program reassessment, in case *Salmonella* performance standards are exceeded, required implementation in Est. 2/A2. *Corrective action was programmed by GOR.*

5. In Est. 2/A2, the program for enforcing the "zero tolerance" policy for fecal contamination on carcasses was not adequately described in the written program; the written HACCP program did not include verification, and on-site documentation of the CCP in the slaughter operation was not performed in Est. 2/A2. *The GOR officials scheduled corrective actions.*

## CONCLUSION

The inspection system of Romania was found to have effective controls to ensure that product destined for export to the United States was produced under conditions equivalent to those which FSIS requires in domestic establishments. Three establishments were audited: one was acceptable, and two were evaluated as acceptable/re-review. The deficiencies



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encountered during the on-site establishment audits, in those establishments which were found to be acceptable, were adequately addressed to the auditor's satisfaction.

Dr. Oto Urban
International Audit Staff Officer

(signed) Dr. Oto Urban

## ATTACHMENTS

A. Data collection instrument for SSOPs
B. Data collection instrument for HACCP programs
C. Data collection instrument for *E. coli* testing
D. Data collection instrument for *Salmonella* testing
E. Laboratory Audit Forms
F. Individual Foreign Establishment Audit Forms
*G.* Written Foreign Country's Response to the Draft Final Audit Report *(no comments received)*



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*Attachment A*

## Data Collection Instrument for SSOPs

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written SSOP program.
2. The procedure addresses pre-operational sanitation.
3. The procedure addresses operational sanitation.
4. The pre-operational procedures address (at a minimum) the cleaning of food-contact surfaces of facilities, equipment, and utensils.
5. The procedure indicates the frequency of the tasks.
6. The procedure identifies the individuals responsible for implementing and maintaining the activities.
7. The records of these procedures and any corrective action taken are being maintained on a daily basis.
8. The procedure is dated and signed by the person with overall on-site authority.

The results of these evaluations were as follows:

| Est. # | 1.Written program addressed | 2. Pre-op sanitation addressed | 3. Oper. sanitation addressed | 4. Contact surfaces addressed | 5. Fre-quency addressed | 6. Respons-ible indiv. identified | 7. Docu-mentation done daily | 8. Dated and signed |
|---|---|---|---|---|---|---|---|---|
| 2/A2 | √ | √ | √ | √ | √ | √ | √ | √ |
| 68 | √ | √ | √ | √ | √ | √ | √ | √ |
| A12 | √ | √ | √ | √ | √ | √ | √ | √ |



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*Attachment B*

**Data Collection Instrument for HACCP Programs**

Each of the establishments approved to export meat products to the U.S. was required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. The establishment has a flow chart that describes the process steps and product flow.
2. The establishment has conducted a hazard analysis that includes food safety hazards likely to occur.
3. The analysis includes the intended use of or the consumers of the finished product(s).
4. There is a written HACCP plan for each product where the hazard analysis revealed one or more food safety hazard(s) reasonably likely to occur.
5. All hazards identified in the analysis are included in the HACCP plan; the plan lists a CCP for each food safety hazard identified.
6. The HACCP plan specifies critical limits, monitoring procedures, and the monitoring frequency performed for each CCP.
7. The plan describes corrective actions taken when a critical limit is exceeded.
8. The HACCP plan was validated using multiple monitoring results.
9. The HACCP plan lists the establishment's procedures to verify that the plan is being effectively implemented and functioning and the frequency for these procedures.
10. The HACCP plan's record-keeping system documents the monitoring of CCPs and/or includes records with actual values and observations.
11. The HACCP plan is dated and signed by a responsible establishment official.
12. The establishment is performing routine pre-shipment document reviews.

The results of these evaluations were as follows:

| Est. # | 1. Flow diagram | 2. Hazard analysis conducted | 3. Use & users included | 4. Plan for each hazard | 5. CCPs for all hazards | 6. Monitoring is specified | 7. Corr. actions are described | 8. Plan validated | 9. Adequate verific. procedures | 10.Adequate documentation | 11. Dated and signed | 12.Pre-shipmt. doc. review |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 2/A2 | √ | √ | √ | √ | √ | √ | √* | √ | √ | no | √ | √ |
| 68 | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ |
| A12 | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ |

2/A2/7* The"zero tolerance" for fecal contamination needs clarification.
2/A2/10 The written HACCP program needs a verification column



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*Attachment C*

## Data Collection Instrument for Generic *E. coli* Testing

**Each establishment was evaluated to determine if the basic FSIS regulatory requirements for generic *E. coli* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:**

1. The establishment has a written procedure for testing for generic *E. coli.*
2. The procedure designates the employee(s) responsible to collect the samples.
3. The procedure designates the establishment location for sample collecting.
4. The sample collection is done on the predominant species being slaughtered.
5. The sampling is done at the frequency specified in the procedure.
6. The proper carcass site(s) and/or collection methodology (sponge or excision) is/are being used for sampling.
7. The carcass selection is following the random method specified in the procedure or is being taken randomly.
8. The laboratory is analyzing the sample using an AOAC Official Method or an equivalent method.
9. The results of the tests are being recorded on a process control chart showing the most recent test results.
10. The test results are being maintained for at least 12 months.

| Est. # | 1.Written procedure | 2. Sampler designated | 3.Sampling location given | 4. Predomin. species sampled | 5. Sampling at the req'd freq. | 6. Proper site or method | 7. Sampling is random | 8. Using AOAC method | 9. Chart or graph of results | 10. Results are kept at least 1 yr |
|---|---|---|---|---|---|---|---|---|---|---|
| 2/A2 | √ | √ | √ | √ | √ | √ | No | √ | √ | √ |
| 68 | √ | No | √ | √ | √ | √ | No | √ | √ | √ |

2/A2 & 68/7 No random method specified in the procedure for *E. coli* testing was followed
68/2 The procedure failed to designate the employee responsible to collect samples



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*Attachment D*

## Data Collection Instrument for *Salmonella* testing

Each slaughter establishment was evaluated to determine if the basic FSIS regulatory requirements for *Salmonella* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. Salmonella testing is being done in this establishment.

2. Carcasses are being sampled.

3. Ground product is being sampled.

4. The samples are being taken randomly.

5. The proper carcass site(s) and/or collection of proper product (carcass or ground) is being used for sampling.

6. Establishments in violation are not being allowed to continue operations.

The results of these evaluations were as follows:

| Est. # | *1. Testing as required* | *2. Carcasses are sampled* | 3. Ground product is sampled | 4. Samples are taken randomly | 5. Proper site and/or proper prod. | 6. Violative est's stop operations |
|---|---|---|---|---|---|---|
| 2/A2 | √ | √ | N/A | No | √ | √ |
| 68 | √ | √ | N/A | No | √ | √ |

2/A2 & 68 The samples were not being taken randomly but by the IIC decision.



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